

### REMARKS

This is in response to the Office Action mailed December 8, 2008, in which the Examiner rejected pending claims 1-8 and 14-21, and identified claims 9-13 as being withdrawn. With this Amendment, Applicant has amended claims 1-8, 14 and 19-21. Reconsideration of the application as amended is respectfully requested.

#### Claim Amendments

Applicant has amended independent claims 1 and 14 to place the claims in compliance with 35 U.S.C. §101. Claim 14 has also been amended to essentially include the Extraction, Transformation and Loading (ETL) designer module of claim 1. Accordingly, the present amendments should not necessitate the performance of a new search by the Examiner.

Claims 2-8 have been amended to replace the term “module” with “system” in the preamble. Claims 19-21 have been amended in response to the elimination of the labels a)-c) in claim 14.

#### Claim Rejections – 35 U.S.C. §101

In Section 5 of the Office Action, the Examiner rejected pending claims 1-8 and 14-21 under 35 U.S.C. §101 because the claimed invention is directed to non-statutory subject matter. Independent claims 1 and 14 have been amended to describe the subject matter as pertaining to a particular computer. Applicant believes that claims 1 and 14, as amended, satisfy the requirements of 35 U.S.C. §101. Withdrawal of the rejections is respectfully requested.

#### Claim Rejections – 35 U.S.C. §103

In Section 7 of the Office Action, the Examiner rejected pending claims 1-8 and 14-21 under 35 U.S.C. §103(a) as being unpatentable over MaGuire, III et al. (U.S. Patent Publication No. 2004/0059651; hereinafter “MaGuire”) in view of Gorelik et al. (U.S. Patent Publication No. 2001/0047372; hereinafter “Gorelik”). Applicant respectfully believes that the rejections can be

withdrawn for the reasons set forth below.

In rejecting independent claims 1 and 14, the Examiner found the conversion engine of MaGuire (paragraphs [0021] [0022]) to disclose all of the previously presented method steps of claim 14, but found that MaGuire “fails to explicitly disclose ETL package.” However, the Examiner found that paragraph [0006] of Gorelik “discusses an ETL system.” The Examiner then concluded that “it would have been obvious to one of ordinary skill in the art at the time the invention was made to modify the system and method of MaGuire to include the ETL system taught by Gorelik, in order to provide means for relation data.” Applicant respectfully believes that a *prima facie* case of obviousness has not been established against independent claims 1 and 14.

MaGuire discloses the processing of data records by a conversion engine 12 in accordance with rules contained in a rules database 14 ([0022]) “to ‘convert’ the data records to take into account different treatments of the data contained in the data records by different regulatory authorities, different taxing authorities, different statutory accounting requirements, different generally accepted accounting principles, and the like.” However, MaGuire fails to disclose the manner in which the rules contained in the rules database 14 are generated. Further, Gorelik fails to disclose a manner in which ETL packages are formed in the ETL system mentioned in paragraph [0006]. Accordingly, neither the existence of rules in the database 14 in MaGuire or the mere mention of an ETL system in Gorelik is sufficient to constitute enabling disclosure of a system designed to configure an ETL package, as described in claim 1, or a method of configuring an ETL package, as described in claim 14. More specifically, the cited references do not disclose “an ETL designer module stored on the tangible computer-readable medium, executable by the processor, and designed to configure the ETL package,” as provided in claim 1, or “generating instructions for configuring an ETL package, responsive to executing the ETL designer module,” as provided in claim 14.

As a result, the Examiner appears to find the system and method of claims 1 and 14 to be inherently disclosed by the cited references. However, it cannot be said that the system and method of claims 1 and 14 are inherent to the disclosure of MaGuire and Gorelik, because the

claimed system and method are not necessarily disclosed in the cited references.

Therefore, the references, taken either alone or in combination, fail to disclose the system of claim 1 or the method of claim 14. Accordingly, claims 1 and 14 are non-obvious in view of the cited references.

Additionally, the Examiner did not identify where the subject matter of claim 1 was disclosed by the cited references. Rather, the Examiner only cursorily addressed the elements of claim 14. Applicant has reviewed the cited references and cannot discern where the cited references disclose the claimed elements. Applicant requests that the Examiner specifically identify the elements of the cited references corresponding to the claimed “ETL designer module”, “destination column class”, “destination column objects”, “an association class”, “association objects”, “a transformation class” and “transformation objects,” which do not appear to be disclosed by the cited references.

Similarly, in rejecting previously presented claim 14, the Examiner failed to identify where either of the references disclose the claimed “association objects” and the “transformation object.” Applicant requests that the Examiner specifically identify these and the other elements of currently amended claim 14 in any cited reference used to reject the claim.

For at least the reasons set forth above, a *prima facie* case of obviousness has not been established against independent claims 1 and 14. Therefore, Applicant requests that the rejections be withdrawn.

Additionally, claims 2-8 and 14-21 are non-obvious in view of the cited references at least for the reasons set forth above with regard to independent claims 1 and 14, from which they depend. Accordingly, Applicant requests that the rejections be withdrawn. Additional grounds for withdrawing the rejections of some of these claims are provided below.

In rejecting claims 4 and 17, the Examiner found Gorelik to teach “a nested relational data model wherein the transformation includes concatenating the source data elements of two or more source columns ([0122] discusses concatenating) . . .” Applicant respectfully disagrees with this finding.

The concatenation discussed in paragraph [0122] of Gorelik is unrelated to a transformation of source data elements, as described in claims 4 and 17. Rather, the cited paragraph provides “[t]he AL\_UNNEST operator transforms a relation into one, which is less deeply nested by concatenating each tuple in the relation being unnested to the remaining attributes in the relation.” Thus, while a concatenating transformation is disclosed in Gorelik, it is unrelated to the transformation of source data elements of source columns of a financial table, as required by independent claims 1 and 14. Accordingly, the cited references either taken alone or in combination, fail to disclose “wherein the transformation includes a concatenation of the source data elements of two or more source columns,” as provided in claim 4, or “wherein the transformation includes concatenating the source data elements of two or more source columns,” as provided in claim 17. Therefore, claims 4 and 17 are non-obvious in view of the cited references.

With regard to claim 6, the Examiner found FIG. 2C of MaGuire to disclose “wherein the transformation and association objects are each siblings of one of the destination column objects,” as provided in claim 6. However, the Examiner failed to identify any element of FIG. 2C that discloses the claimed subject matter. In particular, the Examiner failed to identify the transformation object, the association object, and the claimed sibling relationship between the objects. Therefore, a *prima facie* case of obviousness has not been established against claim 6.

With regard to claim 7, Applicant respectfully disagrees with the Examiner’s finding that FIG. 2C of MaGuire discloses “wherein the destination column objects are siblings of a destination table object defined by a destination table class,” as provided in claim 7. Applicant has reviewed FIG. 2C of MaGuire and cannot discern where the elements of claim 7 are disclosed. The Examiner has failed to identify any elements of MaGuire that correspond to the claimed destination column objects, destination table objects, or the destination table class of claim 7. Therefore, a *prima facie* case of obviousness has not been established against claim 7. Withdrawal of the rejection is respectfully requested.

With regard to claim 21, the Examiner found paragraph [0031] of MaGuire to disclose

the subject matter of claim 21. However, the cited section of MaGuire has no relation to “validating that an association object has been completed for each destination column of the reporter table prior to generating instructions for configuring an ETL package”, as provided in claim 21. Rather, the cited section of MaGuire merely relates to an analysis to determine if any rules affect the replicated entry in JP SoB 114. Therefore, claim 21 is non-obvious in view of the cited references. Withdrawal of the rejection is respectfully requested.

Request for Identification of Corresponding Elements

In order to make the grounds for future rejections of the claims of the present application more clear, Applicant requests that the Examiner specifically identify the element(s) of any cited reference that the Examiner believes correspond to the claimed elements. That is, Applicant requests that the Examiner identify each element of the cited reference(s), on which each claimed element is believed to read. Additionally, Applicant requests that the Examiner provide a detailed explanation of the findings including the manner in which the claim language is being interpreted such that it reads on the cited elements. Such information is believed to be essential in order to properly communicate the basis for the rejections and narrow issues for appeal.

Conclusion

Applicant respectfully believes that the application, as amended, is in condition for allowance. Reconsideration and allowance of the application is respectfully requested.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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